

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

DANIEL PAGAN, an individual,)
)
 Plaintiff,)
)
 v.)
)
 ZAZZLE, INC.,)
 SPREADSHIRT, INC.,)
 BRAIN BUSTER ENTERPRISES, LLC,)
 and RAGEON, INC.)
)
 Defendants.)

Civil Action No. 19 CV 10122 (LGS)

JURY TRIAL DEMANDED

FIRST AMENDED COMPLAINT

**COMPLAINT FOR TRADEMARK INFRINGEMENT,
UNFAIR COMPETITION AND RELATED CLAIMS**

Plaintiff, Daniel Pagan, alleges his complaint against Defendants, Zazzle, Inc., Spreadshirt, Inc., Brain Buster Enterprises, LLC and Rageon, Inc. as follows:

NATURE OF THE ACTION

1. This action arises from Defendant's Zazzle, Inc., Spreadshirt, Inc., Brain Buster Enterprises, and Rageon's infringement of Plaintiff's "ownership" rights in the mark, **LYFE®** in conjunction with clothing, including but not limited to t-shirts, and other related clothing goods. Despite Plaintiff being the senior user and owner of the trademark **LYFE®** and offering various clothing items and merchandise under the **LYFE®** brand, the Defendants have infringed Plaintiff's rights in the aforementioned mark by placing his **LYFE®** trademark or a similar variation of the same on t-shirts and each of the above-identified Defendants are manufacturing, producing, promoting, selling, and offering for sale t-shirts under Plaintiff's trademark. Plaintiff has already experienced "actual confusion" in connection with this matter and is likely to continue to experience confusion as to the affiliation, sponsorship and connection between all of

the Defendants named in this action and Plaintiff by using Plaintiff's trademark in connection with the sale and offering of t-shirts under Plaintiff's **LYFE®** mark.

JURISDICTION AND VENUE

2. This Court has jurisdiction over this action pursuant to 15 U.S.C. §1051 *et seq.*, 15 U.S.C. Sections 1114-1116; under Section 43(a) of the Trademark Act, 15 U.S.C. §1125(a), Section 43(c) of the Trademark Act, 15 U.S.C. §1125(c) and 28 U.S.C. §1367.

3. This Court has personal jurisdiction over the Defendants because Defendants engage in continuous and significant business activities in, and directed to the State of New York within this judicial district and because Defendants have committed tortuous acts aimed at and causing harm within the State of New York and this judicial district. All of the Defendants are also registered with the New York State Division of Corporations.

4. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b) and (c) because it is where Plaintiff maintains a residence and the Defendants transacts business in this district, and because a substantial portion of the events giving rise to the asserted claims have occurred, and continue to occur, within this district. Furthermore, the damage to Plaintiff and its intellectual property described herein continues to occur in this judicial district. Defendants also advertise, market and sell goods in this district via the internet or directly at their retail stores.

THE PARTIES

5. Plaintiff, Daniel Pagan is an individual with an address at 199 Avenue A, New York, NY 10009.

6. Upon information and belief, Defendant Zazzle, Inc. is a California corporation with a principal place of business at 1800 Seaport Blvd, Redwood City, California 94063.

7. Upon information and belief, Defendant Spreadshirt, Inc. is a Delaware corporation with a principal place of business at 186 South Street, 3rd Floor, Boston, MA 02111.

8. Upon information and belief, Defendant Brain Buster Enterprises, LLC. is a Florida Limited Liability Company with a principal place of business at 149 East 18th Street #2, New York, New York 10003.

9. Upon information and belief, Defendant Rageon, Inc. is a Delaware Corporation with a principal place of business at 1163 E 40th Street – Suite 211, Cleveland, Ohio 44114.

FACTS

10. Plaintiff Daniel Pagan, amongst other things, is a fashion designer and promoter of apparel who has managed and operated a retail clothing store that sells and offers for sale clothing items under the mark **LYFE®**.

11. Since at least as early as 2012, Plaintiff Daniel Pagan has been selling headwear, t-shirts, sweaters, hooded sweatshirts and other clothing items under the **LYFE®** brand name.

12. Since at least as early as 2013, Plaintiff has been independently operating a clothing business under the trade name **LYFE CLOTHING CO.™**, which has sold headwear, t-shirts, sweaters, hooded sweatshirts and other related clothing items under the marks **LYFE®** and **LIVE YOUNG FREE EVERYDAY™**.

13. Plaintiff uses the ®, symbol on product packaging materials, hang tags, and on promotional materials he uses in connection with the offering of his clothing items to put the public on constructive notice that Plaintiff is claiming trademark rights in the **LYFE®** brand name.

14. Plaintiff sells, and promotes the sale of his clothing at retail clothing stores, pop-up shops and at sneaker expo and trade shows.

15. Plaintiff advertises his **LYFE®** brand and clothing items at events and through his social media platforms including but not limited to Instagram.

16. Plaintiff's **LYFE®** clothing products enjoys a superlative reputation in the apparel industry.

17. Plaintiff is the registered owner of United States Trademark Registration No. 4,595,742 for the mark **LYFE®**. (See Exhibit A).

18. Plaintiff is the owner of United States Trademark Serial Application No.'s 85/770,354 and 85/775,472 both for the mark **L.Y.F.E.™**. (See Exhibit B).

19. Plaintiff has built and acquired significant rights, including but not limited to common law rights in the **LYFE®** mark in connection with clothing and merchandise based on Plaintiff's long standing and continuous use of the marks in commerce in connection with the promotion, sale and offering of clothing items under the aforementioned mark.

20. Founded in 1999 but publicly launched in 2005, Zazzle is an e-commerce vendor that allows its users and account holders to upload images and designs of artwork, slogans, brand names, and/or other designs that Zazzle then manufactures and prints on novelty items such as t-shirts, caps, hoodies, sweatshirts, baseball jerseys, travel bags, mouse pads, greeting cards, and a myriad of other similar products. These products are then offered for sale to the public.

21. Defendant Zazzle has over 600,000 designers. These designers are mainly individuals who set up an account with Zazzle, upload images and/or design artwork to the www.zazzle.com website, and receive a small royalty for the products that are sold containing reproductions of the images and/or designs.

22. The designers are also able to choose a royalty rate to receive in connection with any product that is sold by Zazzle in connection with that individual's uploaded images. Zazzle starts with a base product price and the designer chooses the royalty rate to receive on top of the

base price, which increases the product price to account for the royalty rate. Consequently, Zazzle makes a set amount for each product that it sells, regardless of the designer, the royalty rate, or the image printed.

23. Zazzle holds a large inventory of blank items (e.g., shirts, caps, sweaters, etc.) at its print and production warehouse and it prints images of those items only after a product is ordered by an end user buyer through the www.zazzle.com website.

24. When a buyer purchases an item from the www.zazzle.com website a Zazzle employee or contractor will take a blank version of that item from the Zazzle warehouse and print and/or otherwise manufacture the selected item bearing the image, design, slogan or name. Zazzle then packages and ships the product to the consumer.

25. Zazzle manages all material aspects of the transactions conducted on its website, including internet hosting, marketing, search engine optimization, production of merchandise, shipping, invoicing, billing, product return, and refunds. The third party designers role is limited to only uploading images, choosing the items to offer in connection with the images, names or slogans, setting the royalty rate and waiting for a royalty check to come in.

26. Zazzle knows that a large amount of images, names and or slogans it prints that are uploaded by its third party designers are infringing the copyright and/or trademark rights of others. Despite this knowledge, Zazzle does very little to protect the rights of intellectual property owners.

27. Plaintiff is informed and believes and thereon alleges that Defendant Zazzle, Inc. is manufacturing, marketing, promoting, selling and offering for sale an extensive catalogue of apparel items including t-shirts and other similar clothing items bearing Plaintiff's **LYFE®** mark on its website www.zazzle.com. The aforementioned use by Zazzle violates Plaintiff's trademark rights in the aforementioned mark. **(See Exhibit C).**

28. Defendant Zazzle is also bidding and purchasing adwords under Plaintiff's **LYFE®** trademark that is directing consumers looking for Plaintiff's clothing to Zazzle's website to purchase its clothing products instead. The aforementioned use of Plaintiff's trademark in search engine keyword advertising programs by Zazzle are a "use in commerce" of Plaintiff's brand name as shown in the image below.

29. Defendant Zazzle's use of Plaintiff's trademarks has already caused confusion and is likely to continue to cause confusion as to the source of clothing products under the **LYFE®** mark.

30. Defendant Spreadshirt, Inc. is an e-commerce retailer and is providing an online store and platform to purchase t-shirts, hoodies and other merchandise and are manufacturing, printing, marketing, promoting, selling and offering for sale via its website www.spreadshirt.com clothing items promoted under Plaintiff's **LYFE®** trademark. (See Exhibit D).

31. Defendant Spreadshirt, Inc.'s use of Plaintiff's trademark has already caused confusion and is likely to continue to cause confusion as to the source of clothing products under the **LYFE®** mark.

32. Defendant Spreadshirt Inc's use of Plaintiff's trademark is not a fair use as SpreadShirt is using the marks for commercial business purposes and for a profit.

33. Defendant Spreadshirt, Inc. has the ability to manage, monitor and control the infringing activity that violates Plaintiff's trademark.

34. Upon information and belief, Defendant Spreadshirt, Inc. is aware and has knowledge of Plaintiff's ownership rights in the **LYFE®** mark.

35. Defendant Brain Buster Enterprises, LLC is an e-commerce retailer and is providing an online store and platform to purchase t-shirts, hoodies and other merchandise and are manufacturing, printing, marketing, promoting, selling and offering for sale via its website

www.Teepublic.com clothing items promoted under Plaintiff's **LYFE®** trademark. (See Exhibit E).

36. Defendant Brain Buster Enterprises use of Plaintiff's trademarks has already caused confusion and is likely to continue to cause confusion as to the source of clothing products under the **LYFE®** mark.

37. Defendant Brain Buster Enterprises use of Plaintiff's trademarks is not a fair use as Brain Buster Enterprises is using the marks for commercial business purposes and for a profit.

38. Defendant Brain Buster Enterprises has the ability to manage, monitor and control the infringing activity that violates Plaintiff's trademarks.

39. Upon information and belief, Defendant Brain Buster is aware and has knowledge of Plaintiff's ownership rights in the **LYFE®** mark.

40. Defendant Rageon, Inc. is an online retailer of clothing products and operates an online store that has sells and advertises various t-shirt bearing Plaintiff's **LYFE™** trademark. Defendant Rageon is using Plaintiff's trademark without consent by placing the mark on t-shirts in silk screen and direct to garment (DTG) printing applications and it is manufacturing, printing, marketing, promoting, advertising, selling and offering for sale via its website www.rageon.com t-shirts promoted under and using Plaintiff's **LYFE®** trademark.

41. Defendant Rageon, Inc.'s use of Plaintiff's trademarks has already caused confusion and is likely to continue to cause confusion as to the source of clothing products under the **LYFE®** mark.

42. Defendant Rageon, Inc.'s use of Plaintiff's trademarks is not a fair use as Rageon is using the marks for commercial business purposes and for a profit.

43. Defendant Rageon, Inc. has the ability to manage, monitor and control the infringing activity that violates Plaintiff's **LYFE®** trademark.

44. Upon information and belief Defendant Rageon, Inc. is aware and has knowledge of Plaintiff's ownership rights in the **LYFE®** mark.

45. Defendant Rageon Inc.'s infringement of Plaintiff's trademarks is willful as it is aware of the infringing content it was selling and offering for sale from its website www.rageon.com.

46. Defendant Rageon Inc. has acted in bad faith in using Plaintiff's trademarks as it has attempted to palm off the good will and reputation that Plaintiff has built in his **LYFE®** mark.

FIRST CAUSE OF ACTION
TRADEMARK INFRINGEMENT (15 U.S.C. §§ 1114-1116)

47. Plaintiff repeats and realleges each and every allegation contained in Paragraphs 1 through 46 of this Complaint.

48. The use in commerce by Defendants of an identical version of Plaintiff's registered trademark is likely to cause confusion, mistake and deception among members of the public and in trade as to the source, origin, or sponsorship of defendants' goods and services. Such use by Defendants constitutes a clear and direct infringement of Plaintiff's rights in and to Plaintiff's registered trademark, and has resulted in injury and damage to Plaintiff that will continue if Defendants are not ordered to cease all use of the **LYFE®** mark.

SECOND CAUSE OF ACTION
UNFAIR COMPETITION & FALSE DESIGNATION OF ORIGIN (15 U.S.C. § 1125(a))

49. Plaintiff repeats and realleges each and every allegation contained in Paragraphs 1 through 48 of this Complaint.

50. Plaintiff has the exclusive right to market, brand and provide clothing related goods using the **LYFE®** mark.

51. Defendants Zazzle, Inc., Spreadshirt, Inc., Brain Buster Enterprises, and Rageon by reason of the aforementioned acts, have falsely described, represented and designated the origin of its goods and services. Defendants' activities already have confused the public into believing that Defendants and Plaintiff's clothing goods and accessories come from one and the same source, and Defendants continued activities are likely to create further confusion and deceive the public concerning the source of the goods/services.

52. Defendants Zazzle, Inc., Spreadshirt, Inc., Brain Buster Enterprises, and Rageon have unfairly profited from the actions alleged herein and will continue to unfairly profit and become unjustly enriched unless and until such conduct is enjoined by this Court.

53. By reason of Defendants Zazzle, Inc., Spreadshirt, Inc., Brain Buster Enterprises, and Rageon willful acts conducted in conscious disregard for Plaintiff's rights, Plaintiff is entitled to treble damages under 15 U.S.C. § 1117(a).

THIRD CAUSE OF ACTION COMMON LAW TRADEMARK INFRINGEMENT & UNFAIR COMPETITION

54. Plaintiff repeats and realleges each and every allegation contained in Paragraphs 1 through 53 of this Complaint.

55. Defendants Zazzle, Inc., Spreadshirt, Inc., Brain Buster Enterprises, and Rageon conduct constitutes deception by which Defendants goods will be palmed off as those of Plaintiff. Such conduct constitutes trademark infringement and unfair competition in violation of the laws of the State of New York.

56. Defendants Zazzle, Inc., Spreadshirt, Inc., Brain Buster Enterprises, and Rageon unauthorized use of Plaintiff's **LYFE®** marks is likely to continue to cause further confusion to the public as to the clothing goods and accessories of the respective parties.

57. By reason of the foregoing, Defendants Zazzle, Inc., Spreadshirt, Inc., Brain Buster Enterprises, and Rageon have infringed and continue to infringe on Plaintiff's common law rights in the **LYFE®** mark and Defendants have become unjustly enriched by such acts of infringement.

58. Defendants Zazzle, Inc., Spreadshirt, Inc., Brain Buster Enterprises, and Rageon unlawful conduct has been and will continue to be willful or willfully blind to Plaintiff's rights, as Defendant has reason to know of Plaintiff's rights in the name.

FOURTH CAUSE OF ACTION UNJUST ENRICHMENT

59. Plaintiff repeats and realleges each and every allegation contained in Paragraphs 1 through 58 of this Complaint.

60. Defendants Zazzle, Inc., Spreadshirt, Inc., Brain Buster Enterprises, and Rageon have unjustly retained profits from the sale of clothing goods and accessories bearing Plaintiff's **LYFE®** mark.

61. Defendant's Zazzle, Inc., Spreadshirt, Inc., Brain Buster Enterprises, and Rageon actions constitute unjust enrichment.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays for relief as follows:

1. Entry of an order and judgment requiring that all Defendants, its subsidiaries, officers, agents, servants, employees, owners, and representatives, and all other persons or entities in active concert or participation with them, be preliminarily and, thereafter, permanently enjoined and restrained from (a) using in any manner the trade name, trademark, domain name or other indicia or origin, including in whole or part the term **LYFE®**, or any colorable imitation thereof; (b) advertising, operating a website, using business stationary or offering any goods or services using the trade name, trademark, domain name, URL, or any other indicia of origin including in whole or part the term **LYFE®**, or any colorable imitation thereof; (c) otherwise engaging in any acts of unfair competition and infringement which tend to injure Plaintiff's rights in the **LYFE®** mark.

2. That Defendants be required to account to Plaintiff for any and all profits derived by it, and to compensate Plaintiff for all the damages sustained by reason of the acts complained of herein, and that the damages herein be trebled pursuant to the Trademark Act.

3. That Defendants be ordered to deliver up for destruction any and all infringing materials bearing the **LYFE®** mark, and any colorable imitation thereof, in whole or part.

4. That Plaintiff be awarded punitive damages against all Defendants.

5. That Defendants be required to place advertisements or send notifications to past and present customers that it improperly has been using the **LYFE®** and/or **LIFE™** marks.

6. That Plaintiff be awarded statutory damages in the amount of \$500,000.00 from each named Defendant for Defendants acts of willful infringement of Plaintiff's **LYFE®** trademark.

7. That Plaintiff be awarded the cost and disbursements of this action.

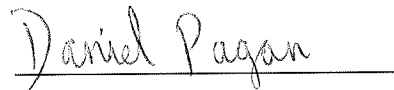
8. That Plaintiff have such other and further relief as the Court deems just and proper.

JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff hereby demands a trial by jury as to all issues.

Dated: January 16, 2020
New York, New York

Respectfully submitted,
Daniel Pagan – Pro Se

A handwritten signature of Daniel Pagan in cursive script, written in black ink, positioned above a horizontal line.

Daniel Pagan
Pro Se Plaintiff
199 Avenue A
New York, New York 10009
(718) 873-5564

EXHIBIT A

United States of America

United States Patent and Trademark Office



Reg. No. 4,595,742

Registered Sep. 2, 2014

Int. Cl.: 25

TRADEMARK

PRINCIPAL REGISTER

PAGAN, DANIEL (UNITED STATES INDIVIDUAL)

#3

105 RALPH AVE
BROOKLYN, NY 11221

FOR: HATS; JEANS; SHORTS; SOCKS; SWEATERS; SWEATSHIRTS; T-SHIRTS; UNDERWEAR, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 1-1-2013; IN COMMERCE 5-1-2013.

THE MARK CONSISTS OF THE STYLIZED LETTERS "LYFE" COMBINED TO CREATE A ONE FIGURE LOGO.

SER. NO. 86-062,388, FILED 9-12-2013.

EDWARD FENNESSY, EXAMINING ATTORNEY



Michelle K. Lee

Deputy Director of the United States
Patent and Trademark Office

EXHIBIT B



United States Patent and Trademark Office

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L.Y.F.E

Word Mark	L.Y.F.E
Goods and Services	IC 025. US 022 039. G & S: Hats; Jeans; Shirts; Socks; Sweaters; Sweatpants; Sweatshirts; Underwear
Standard Characters Claimed	
Mark Drawing Code	(4) STANDARD CHARACTER MARK
Serial Number	85770354
Filing Date	November 2, 2012
Current Basis	1B
Original Filing Basis	1B
Published for Opposition	August 29, 2017
Owner	(APPLICANT) Pagan, Daniel J INDIVIDUAL UNITED STATES 71 Sands St Staten Island NEW YORK 10304
Type of Mark	TRADEMARK
Register	PRINCIPAL
Live/Dead Indicator	LIVE

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L.Y.F.E



Word Mark	L.Y.F.E
Goods and Services	IC 025. US 022 039. G & S: Hats; Jeans; shirts; socks; sweat pants; sweat shirts; sweaters; underwear
Mark Drawing Code	(3) DESIGN PLUS WORDS, LETTERS, AND/OR NUMBERS
Design Search Code	05.03.08 - More than one leaf, including scattered leaves, bunches of leaves not attached to branches 05.03.25 - Leaf, single; Other leaves 26.01.18 - Circles, three or more concentric; Concentric circles, three or more; Three or more concentric circles 26.01.26 - Coils; Spirals; Swirls 27.01.03 - Letters forming plants; Numbers forming plants; Plants composed of letters or numerals; Punctuation forming plants
Serial Number	85775472
Filing Date	November 9, 2012
Current Basis	1B
Original Filing Basis	1B
Published for Opposition	April 4, 2017
Owner	(APPLICANT) Pagan, Daniel INDIVIDUAL UNITED STATES 71 Sands Street Staten Isand NEW YORK 10304
Description of Mark	Color is not claimed as a feature of the mark. The mark consists of the stylized term "L.Y.F.E." with little leaves hanging off the edges of the letters and a design comprising three spirals in the center of three concentric circles with points emanating out from the edge of the circles.

EXHIBIT C

(<https://www.zazzle.com/>)

lyfe t-shirt



(<https://www.zazzle.com/co/cart>)

Create Your Own

Invitations & Cards

Clothing & Accessories

Home & Living

El

[Clothing & Shoes \(https://www.zazzle.com/clothing\)](https://www.zazzle.com/clothing) > [Men \(https://www.zazzle.com/mens+fashion\)](https://www.zazzle.com/mens+fashion) >

[Clothing \(https://www.zazzle.com/mens+clothing\)](https://www.zazzle.com/mens+clothing) > [Tops & T-Shirts \(https://www.zazzle.com/mens+tops\)](https://www.zazzle.com/mens+tops) >

[Men's T-Shirts \(https://www.zazzle.com/mens+tshirts\)](https://www.zazzle.com/mens+tshirts)

Lyfe T-Shirt

\$17.95

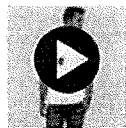
per shirt

Qty: 1



Add to Cart

15% off with code WEEKDAYWITHZ



Independent artist's content may not match model depicted;
RealView™ technology illustrates fit and usage only.



Lyfe

Designed for you

by [Ryguy412 \(https://www.zazzle.c...](https://www.zazzle.com/)

Customize

Size

Select a size

[Size Chart](#)

Style

Basic T-Shirt



[See more](#)

Color & Print Process

White

[Learn more](#)

Classic Printing: No Underbase

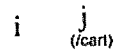


Share this:

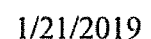


Estimated delivery Jan 24 to Jan 25 via
[Shipping options](#)

EXHIBIT D



CASES & STICKERS
(/PHONE-CASE)





Each purchase supports an independent artist.

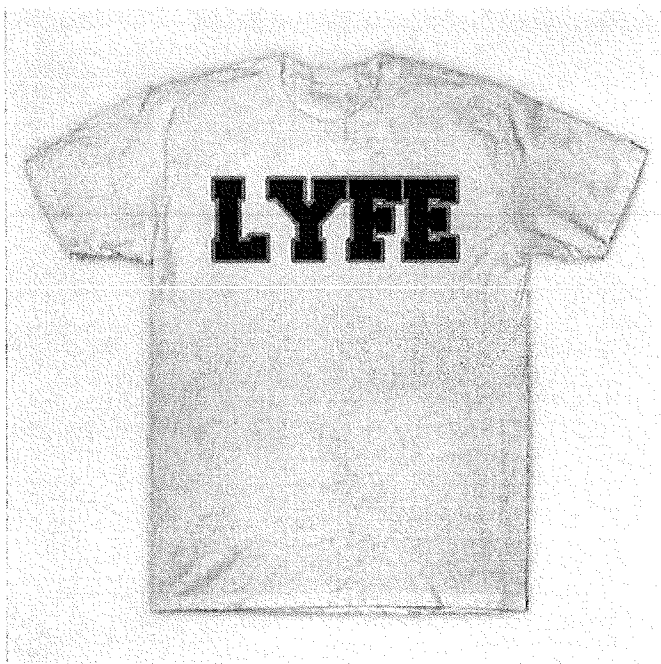
BROWSE
(/T-SHIRTS)

ADULT APPAREL
(/T-SHIRTS)

KIDS (/KIDS-T-SHIRT)

HOME GOODS
(/POSTERS-AND-ART)

CASES & STICKERS
(/PHONE-CASE)



Miami LYFE!!! T-Shirt

Miami Hurricane T-Shirt
 Design by OffesniveLine (/user/offesniveLine)
 You're all about that Miami lyfe...now show it!

Color: White

Gender ☒ Male

Style ☐ Classic T-Shirt

Size ☐ Select a Size

Size Chart

\$20

ADD TO CART



q (https://twitter.com/share?url=http%3A%2F%2Ftee.pub%2Flic%2F1fuK43Mlz3A&text=Check out this awesome 'Miami+LYFE%21%21%21' design on @TeePublic)

Z (http://pinterest.com/pin/create/button/?url=https%3A%2F%2Fwww.teepublic.com%2Ft-shirt%2F2866309&media=https%3A%2F%2Fres.cloudinary.com%2Fteepublic%2Fimage%2Fprivate%2Fs--wHibYx7--%2FPreview%2Fb_rgb%3Affffff%2Cc_limit%2Cf_jpg%2Ch_630%2Cq_90%2Cw_630%2Fv1530977375%2Fproduction%2Fdesigns%2F2866309_0.jpg&description=Check+out+this+awesome+%27Miami%2BLYFE%2521%2521%2521%27+design+on+%40TeePublic%21)

w (https://www.tumblr.com/widgets/share/tool?posttype=link&canonicalUrl=https%3A%2F%2Fwww.teepublic.com%2Ft-shirt%2F2866309-miami-lyfe%3Futm_campaign%3DPLA%26utm_content%3DTshirt-unisex%26feed_sku%26utm_medium%3Dppc%26utm_campaign%3DPLA%26ar_clx%3Dyes%3DShopping_Top_Level_T-Shirts%26ar_adgroup%3DT-Shirts%26clid%3DJXBRCpARisAGqF8wWUHYs4PLX2WVq4folc6Obz28p_Re5B5vTLXWPl out this awesome 'Miami+LYFE%21%21%21' design on @TeePublic)

Material Info

100% combed ringspun cotton. The perfect fabric for a graphic tee and the softest in the business. [Learn More »](#)

Shipping (USA)

DHL Budget (7-10 Business Days)
 UPS Air (3-5 Business Days)
 Estimates include 3 days of printing and processing time. [More Shipping Info »](#) (/shipping)

Returns & Exchanges

We want you to love your order! If for any reason you don't, let us know and we'll make things right. [Learn More »](#) (/refunds-and-returns)

Miami LYFE!!! Adult Apparel



Tank Top
(/tank-top/2866309-)

Long Sleeve T-Shirt



Baseball T-Shirt
(/baseball-tee/2866309-)

Crewneck Sweatshirt



Hoodie
(/hoodie/2866309-)

EXHIBIT E



○ ○ ○ ○ ○